

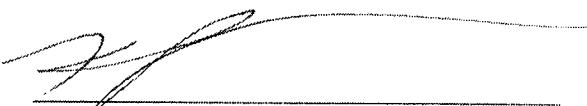
UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

MICROSOFT CORPORATION,	)	
SAP AG, and SAP AMERICA, INC.,	)	
Plaintiffs,	)	<b><u>Consolidated Cases:</u></b>
v.	)	Civil Action No. 11-cv-02365-RJH
DATATERN, INC.,	)	Civil Action No. 11-cv-02648-RJH
Defendant.	)	<b>MOTION FOR ADMISSION</b> <b><i>PRO HAC VICE</i></b>

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Kia L. Freeman, hereby move this court for an Order for admission to practice *pro hac vice* to appear as counsel for Datatern, Inc. in the above-captioned action.

I am in good standing with the bars in the state of Massachusetts and the District of Columbia, as well as the United States District Court in the District of Massachusetts and the United States Federal Circuit Court of Appeals. There are no pending disciplinary proceedings against me in any state or federal courts.

Respectfully submitted,

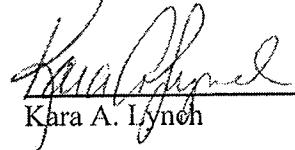


Kia L. Freeman  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110  
617-449-6526  
kfreeman@mccarter.com

July 8, 2012

**CERTIFICATE OF SERVICE**

I certify that, on this 19<sup>th</sup> day of July, 2012, I caused true copies of this document to be served by electronic mail upon counsel of record for each other party.



Kara A. Lynch  
Kara A. Lynch

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

MICROSOFT CORPORATION,	)	
SAP AG, and SAP AMERICA, INC.,	)	
Plaintiffs,	)	<b><u>Consolidated Cases:</u></b>
v.	)	Civil Action No. 11-cv-02365-RJH
DATATERN, INC.,	)	Civil Action No. 11-cv-02648-RJH
Defendant.	)	<b>DECLARATION OF KIA L. FREEMAN IN SUPPORT OF MOTION FOR ADMISSION <i>PRO HAC VICE</i></b>

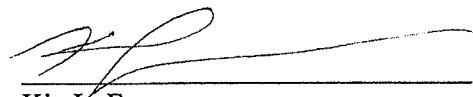
I, Kia L. Freeman, declare under the penalty of perjury as follows:

1. I am an attorney with McCarter & English, LLP, counsel for Datatern, Inc. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of my motion for admission *pro hac vice* as counsel to represent Datatern, Inc. in above captioned consolidated matters.
2. I am a member in good standing of the bars of the states of Massachusetts (admitted on December 14, 1999) and District of Columbia (admitted on October 2, 2000). I am also admitted to practice law in the United States District Court in the District of Massachusetts and the United States Federal Circuit Court of Appeals. I am in good standing with all of these courts and there are no disciplinary proceedings pending against me.
3. Pursuant to Local Civil Rule 1.3(c), I have attached the certificates of good standing for the bars of the states of Massachusetts and the District of Columbia as Exhibit A hereto.

4. I am experienced in federal practice and familiar with the Federal Rules of Civil Procedure and the rules of this Court.

5. I respectfully submit the motion for admission *pro hac vice* and the proposed order granting my admission *pro hac vice*, which is attached to the motion as Exhibit B..

WHEREFORE, it is respectfully requested that the motion to admit Kia L. Freeman, *pro hac vice*, to represent Datatern, Inc. in the above-captioned matter, be granted.



Kia L. Freeman

July 18, 2012

# Exhibit A

**COMMONWEALTH OF MASSACHUSETTS**

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **fourteenth** day of **December** A.D. **1999**, said Court being the highest Court of Record in said Commonwealth:

Kia Lynn Freeman

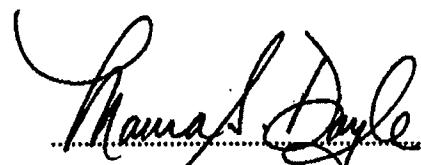
being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the

seal of said Court, this **seventeenth** day of **July**

in the year of our Lord **two thousand and twelve**.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D.C. 20001  
202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

KIA L. FREEMAN

*was on the 2<sup>ND</sup> day of OCTOBER, 2000*

*duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

*In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 16, 2012.*

*JULIO A. CASTILLO  
Clerk of the Court*

*By: Brandie Hancock  
Deputy Clerk*

# Exhibit B

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

MICROSOFT CORPORATION,	)	
SAP AG, and SAP AMERICA, INC.,	)	
Plaintiffs,	)	<b><u>Consolidated Cases:</u></b>
v.	)	Civil Action No. 11-cv-02365-RJH
DATATERN, INC.,	)	Civil Action No. 11-cv-02648-RJH
Defendant.	)	[PROPOSED]
	)	<b>ORDER FOR ADMISSION</b>
	)	<b><i>PRO HAC VICE</i></b>

The motion of Kia L. Freeman for admission to practice *pro hac vice* in the above captioned consolidated actions is granted.

The applicant has declared that she is a member in good standing of the bar in the states of Massachusetts and the District of Columbia, as well as the United States District Court in the District of Massachusetts and the United States Federal Circuit Court of Appeals, and that her contact information is as follows:

Kia L. Freeman, Esq.  
McCarter & English, LLP  
265 Franklin Street  
Boston, MA 02110  
617-449-6549  
kfreeman@mccarter.com

The applicant has requested admission *pro hac vice* to appear for all purposes for Datatern, Inc. in the above entitled consolidated matters;

**IT IS HEREBY ORDERED** that Kia L. Freeman is admitted to practice *pro hac vice* in the above captioned case in the United States Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the

Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password.

July \_\_, 2012

---

United States District Judge